

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

* **Criminal Case No.: GLR-20-0114**

CHELSEA ANN KUYAWA

*

Defendant

*

* * * * * * * * * * *

DEFENDANT'S UNOPPOSED MOTION TO EXTEND TIME FOR SELF-SURRENDER AND REQUEST FOR INSTITUTION RECOMMENDTION

NOW COMES the Defendant, Chelsea A. Kuyawa (hereinafter, "Defendant"), by and through her attorneys, Paul R. Kramer, LLC, and hereby respectfully requests this Honorable Court extend the time for the Defendant to self-surrender and issue a recommendation the Defendant be designated to in the above-entitled matter. In support of this Motion, the Defendant states as follows:

1. That the Defendant was charged with a single count of a violation of 18 U.S.C. §2252A(a)(5)(B).
2. That the Defendant entered a plea of guilty and accepted responsibility for her actions. On October 16, 2020, this Honorable Court sentenced to 42 months of incarceration. The Defendant was permitted to self-surrender.
3. That this Honorable Court previously extended the time for the Defendant to self-surrender because the Defendant was pregnant. As a result, this Honorable Court ordered the Defendant self-surrender on July 09, 2021.

4. That in January of 2021, the Defendant received information she would serve her sentence at FCI Hazelton. This information was received before this Honorable Court extended the Defendant's turn in date.
5. That currently the Defendant it is not clear if the Defendant is presently designated to FCI Hazelton.
6. That FCI Hazelton is a secure prison and does not have the type of programs that will benefit the Defendant's rehabilitation. In addition, there are legitimate concerns for the Defendant's safety at FCI Hazelton given the nature of the Defendant's offense conduct.
7. That the Defendant is requesting this Honorable Court issue a recommendation the Defendant serve her term of incarceration at the Federal Satellite Low ("FSL") at Danbury (in Connecticut). FSL Danbury is not a prison camp, and such a recommendation is consistent with this Honorable Court's recommendation the Defendant serve her sentence at FCI Alderson or another appropriate low security FCI for treatment (RDAP and/or mental health treatment).
8. That FSL Danbury houses a new unique program only available at FSL Danbury called Female Integrated Treatment (FIT). FIT is a residential treatment program that offers treatment for substance abuse disorders, mental health issues, trauma related disorders, and vocational training.
9. That given the Defendant's documented history of mental illness and substance abuse FIT would be an excellent fit for the Defendant's rehabilitation.
10. That the Defendant's family has hired the services of Justice Advocacy Group (JAG) to work with Bureau of Prisons (BOP) to place the Defendant at FSL Danbury.

11. That JAG requires additional time to work with BOP on placing the Defendant at FSL Danbury.
12. That the Defendant gave birth to a baby boy on May 24, 2021. Unfortunately, the child was born with a heart condition. This condition required the child to undergo a procedure which requires several follow up visits. That there is a scheduled review with the child's pediatrician on July 29, 2021. *See;* attached as Exhibit #1, discharge paperwork from the University of Maryland Medical Center detailing the procedure performed and appointment date on July 29, 2021. Incorporated herein by reference and made part hereof.
13. That until she is incarcerated, the Defendant is the child's primary caregiver.
14. That the Defendant would like to attend this review before she is incarcerated to make sure of the child's status and health care plan.
15. That for the above-noted reasons the Defendant is seeking to have her self-surrender date extended until August 02, 2021.
16. Undersigned counsel's office has been advised by the Assistant United States Attorney who prosecuted the instant matter, Michael P. Cunningham, the Government **does not oppose** the Defendant's request for a recommendation to FSL Danbury and **does not oppose** the Defendant's self-surrender date being extended to August 02, 2021.
17. That no party to the above-entitled matter will be prejudiced if the relief sought herein is granted.
18. That the Defendant is not a flight risk and is presently otherwise in compliance with the ordered conditions of release.

19. That in the interests of justice, the instant relief should be granted.

WHEREFORE, the Defendant, Chelsea A. Kuyawa, respectfully requests the relief herein be **GRANTED** and her self-surrender date be extended to August 02, 2021, that this Honorable Court issue a recommendation the Defendant serve her sentence of incarceration at FSL Danbury, recommend the Defendant participate in FIT and this Honorable Court **GRANT** any other, or further, relief, it deems appropriate, the nature of the Defendant's cause may permit or the interests of justice may require.

Respectfully submitted,

/s/ Paul R. Kramer
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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion was sent electronically mailed this 02 day of July, 2021 to: Michael Cunningham, Assistant United States Attorney.

/s/ Paul R. Kramer
Paul R. Kramer
PAUL R. KRAMER, LLC